

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:  
IRIS C. COLL BAHAMONDE

DEBTOR(S)

CASE NO. 11-08122 (BKT)

CHAPTER 13

MOTION TO OBJECT CONFIRMATION OF PAYMENT PLAN

Comes now secured creditor, USDA RURAL DEVELOPMENT, hereinafter USDA, through the undersigned counsel and respectfully alleges and prays as follows:

1. USDA is a secured creditor having a duly executed and registered mortgage loan. Its claim is claim No. 1 in the claims register of the above petition.
2. Creditor has filed a secured proof of claim for \$15,360.29, which includes \$13,074.11 in pre petition arrears.
3. Debtor's Payment Plan, dated September 29, 2011, proposes to pay USDA \$12,527.18 in secured pre-petition arrears thru the Chapter 13 Trustee, and that debtor will maintain regular payments directly to creditor.
4. The proposed Plan should not be confirmed because debtor does not owe \$12,527.18 in pre-petition arrears, debtor owes \$13,074.11.

WHEREFORE, USDA RURAL DEVELOPMENT respectfully requests that this Honorable Court deny the confirmation of the Plan and issue such orders as may be just and proper.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 31st day of October 2011.

CERTIFICATE OF SERVICE

I hereby certify that on the same date above I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee JOSE R. CARRION MORALES (newecfmail@ch13-pr.com), and debtor's attorney MARILYN VALDES-ORTEGA (valdeslaw@prtc.net). I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants: To

debtor(s) IRIS C. COLL BAHAMONDE and at their postal address of record – Urb. Alturas de Río Grande, DD 48 Calle H, Río Grande, PR 00745.

/s/ Juan Carlos Fortuño Fas  
JUAN CARLOS FORTUÑO FAS  
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11-08122 Objection to Confirmation of Payment Plan